

March 17, 2023

VIA ELECTRONIC CASE FILING (“ECF”)

The Honorable Robert W. Lehrburger, USMJ

United States District Court

Southern District of New York

Daniel Patrick Moynihan

500 Pearl Street, Courtroom 18D

New York, New York 10007

Re: Milagro Rivera v. Kilolo Kijakazi, Acting Commissioner of Social Security
Index No.: 1:22-cv-06976-ER-RWL
Letter Motion Requesting Additional Time to File Plaintiff’s Motion

Dear Hon. Lehrburger:

Manhattan Legal Services (“MLS”), through the undersigned, is representing Plaintiff, Milagro Rivera (hereinafter referred to as “Mrs. Rivera” or “Plaintiff”) in the above-captioned matter. Please accept this correspondence in relation to Plaintiff’s Motion for Judgment on the Pleadings, which has a return date of Tuesday, March 21, 2023, pursuant to the Scheduling Order.

We respectfully request an expansion of time to submit Plaintiff’s moving papers for judgment on the pleadings. We note that the undersigned will be out of the office, due to medical reasons, and will not return until Monday, April 3, 2023. Therefore, the undersigned will not be able to submit Plaintiff’s moving papers on the motion return date. We sincerely apologize for the last-minute inconvenience. Moreover, we note that, prior to motioning the Court for an expansion of time to appear and respond, the undersigned has obtained the mutual consent of Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (hereinafter referred to as “Commissioner” or “Defendant”), through her counsel, Mr. Jason P. Peck, at the Office of General Counsel for the Social Security Administration.

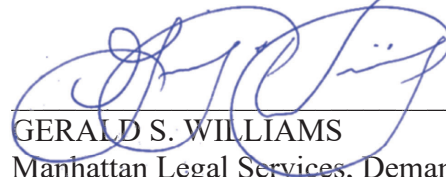
Accordingly, we kindly and respectfully request Your Honor expand time for Plaintiff’s moving papers to be filed to April 3, 2023, or to a date that Your Honor deems fair and adequate to appropriately appear and respond in this matter.

Should Your Honor have any questions or concerns, please contact me either at (646)237-7769 or via electronic mail at gwilliams@lsnyc.org. Best wishes for continued good health during these uncertain times.

Thank You for Your Honor's consideration to this request.

Respectfully Submitted,

LEGAL SERVICES NYC



GERALD S. WILLIAMS
Manhattan Legal Services, Demand Justice
40 Worth Street, Suite 606
New York, New York 10013
Telephone: (646)237-7769
Facsimile: (646)237-7751
Email: gwilliams@lsnyc.org

Attorneys for Plaintiff

Request granted. Plaintiff's papers due April 3, 2023. Defendant's papers due June 3, 2023. Plaintiff's reply, if any, due June 24, 2023.

SO ORDERED:

3/17/2023



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Notice Sent to Defendant via ECF notification and addressed to: jason.peck@ssa.gov.